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October 22, 2020

MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: October 23, 2020

By ECF

Honorable Paul G. Gardephe
U.S.D.C. Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007-1312

Re: *Anderson, et al., as Trustees of the Local 966 Welfare Trust Fund v.
736 Willoughby Housing Development Fund Corporation
d/b/a Lisa Management, Inc. d/b/a Emerge Associates LLC, et al.,
20 Civ No. 4137 (PGG)*

Dear Judge Gardephe:

This office represents Plaintiffs in the above-referenced case. We write regarding your Order requesting that Plaintiffs move for default against Defendant 736 Willoughby Housing Development Fund Corporation (“Willoughby”) by October 22, 2020.

Plaintiffs write to advise the Court that on October 21, 2020, they filed for the Clerk of Court’s entry of default, Docket No. 34-38.

Plaintiffs now respectfully request thirty (30) days, until November 19, 2020 to file the Order to Show Cause and the full default judgment motion including proof of damages. Counsel has begun the process by seeking the requisite documents from the Fund Office and other Defendants in this matter in order to submit a satisfactory motion to the Court.

Thank you for Your Honor’s consideration of this matter. Please note that we have also filed a voluntary dismissal with respect to Defendant Lincoln Van Buren today.

Respectfully submitted,

/s/ Lisa M. Gomez

Lisa M. Gomez

LMG/sa

cc: Dan Morris, Esq. (via ECF)
Evan Richards, Esq. (via ECF)